

### Remarks

Claims 1, 7-10, 14-16, and 18-20 are pending in this application. Claims 2, 11, and 17 are cancelled herein. Claims 1, 7, 9, and 14 are currently amended. The Examiner has rejected claims 1-20 as being obvious under 35 U.S.C. § 103(a) over U.S. Patent No. 6,785,805 to House (hereinafter “House”) in view of U.S. Patent No. 7,136,908 to Cline (hereinafter “Cline”).

#### **Claims 1-20 are Not Obvious Over House and Cline**

A prima facie case of obviousness requires a showing that all of the claim limitations of the rejected claims are taught or suggested by the prior art. Manual of Patent Examining Procedure 2143 and 2143.03. “All words of a claim must be considered in judging the patentability of that claim against the prior art.” In re Wilson, 424 F.2d 1382, 1385, 165 U.S.P.Q. 494, 496 (CCPA 1970). Claims 1-20 are not obvious over the combination of House and Cline because the combination fails to teach or suggest all of the elements of the Applicants’ claims. Specifically, the cited combination of House and Cline fails to teach or suggest at least that the step of establishing a communication link comprises the step of establishing a **virtual private network link** between the processing unit of the integrated computer network and the existing computer network of the customer, as required by the claims of the present invention.

Applicants note that independent claims 1, 7, 9, and 14 have been amended to include the elements of now-cancelled dependent claims 2, 11, and 17. The present invention is advantageous due to the use of a **virtual private network link**, which is any type of private communications network that is configured within a public network (such as the Internet). The virtual private network provides for secure, site-to-site connections across geographic areas, such as between a manufacturing facility and a customer facility. (Published Spec., [0015]) The

security provided by a virtual private network link established as part of the communications link between the customer and the manufacturer is important and desirable due to the transmission of potentially sensitive data regarding the customer's network. Additionally, the ability to create or configure such a secure, private network within a public network provides flexibility and ease of access afforded by a public framework like the Internet. Thus, the system and methods of the present invention allows for the secure communication of data between customer and manufacturer, while also allowing for flexibility in this communication due to the use of a **virtual private network**.

The Examiner has failed to show that the combination of House and Cline teaches or suggests that the step of establishing a communication link comprises the step of establishing a **virtual private network link** between the processing unit of the integrated computer network and the existing computer network of the customer. The Examiner referred to a previous Office Action, dated March 20, 2007, for the rejection of the claims under section 103. In that office action, the Examiner cites House as teaching an online build-to-order system in which a customer is able to place an order for a network. (3/20/2007 OA, p.2) The Examiner likens the online configuration mentioned briefly in House at column 16, line 41 to establishing a communication link and transferring data but fails to discuss, in any manner, the requirement of the amended claims that the step of establishing a communication link comprises the step of establishing a **virtual private network link**. (3/20/2007 OA, p.2) The cited portion of House fails to teach or suggest virtual private network links.

The Examiner cites Cline as teaching transferring a service directory from one network to another in claims 1 and 12-14 of Cline. (3/20/2007 OA, p.2) However, the Examiner does not cite Cline as teaching or suggesting that the step of establishing a communication link

comprises establishing a **virtual private network link** between the processing unit of the integrated computer network and the existing computer network of the customer. Applicants respectfully request that the Examiner specifically point out in the references where the Examiner believes that a specific claim element is taught or suggested. Because the above elements of the independent claims are not shown to be taught or suggested by the cited combination of House and Cline, a *prima facie* case of obviousness is not established. Applicants believe that the amendments made herein place the pending claims in condition for allowance. As such, Applicants respectfully request that the independent claims and all base claims which depend therefrom should be passed to issuance.

#### **No Waiver**

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicants are sufficient to overcome the obviousness rejections.

**Conclusion**

Applicants respectfully submit that pending claims 1, 7-10, 14-16, and 18-20 of the present invention are allowable. Applicants respectfully request that these claims be passed to issuance.

Respectfully submitted,



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